

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 20-
v.	:	DATE FILED:
THOMAS ROBERTSON a/k/a Steven Hall	:	VIOLATIONS: 18 U.S.C. § 1344(2) (bank fraud - 2 counts) 18 U.S.C. § 1014 (false statements on loan applications -2 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Sun East Federal Credit Union was a financial institution, the deposits of which were insured by the National Credit Union Share Insurance Fund ("NCUSIF").
2. From on or about October 17, 2018 through on or about October 19, 2018, in the Eastern District of Pennsylvania, defendant

THOMAS ROBERTSON,
a/k/a Steven Hall,

knowingly executed and attempted to execute a scheme to obtain the money, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution insured by the NCUSIF, namely Sun East Federal Credit Union, by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

3. From on or about October 17, 2018 through on or about October 19, 2018, defendant THOMAS ROBERTSON knowingly executed and attempted to execute a scheme to

use a false employment history, falsely overstated income information, and fake paystubs to obtain loans and credit from Sun East Federal Credit Union.

4. From on or about October 17, 2018 through on or about October 19, 2018, defendant THOMAS ROBERTSON created fake paystubs with falsely overstated income that were submitted to Sun East Federal Credit Union.

5. On or about October 18, 2018, defendant THOMAS ROBERTSON submitted a fraudulent loan application to Sun East Federal Credit Union seeking a \$5,000 personal loan.

6. The loan application completed and signed by defendant THOMAS ROBERTSON falsely overstated his monthly income and falsely claimed that he had been employed by his business since October 2015, when in fact he was federally incarcerated from before October 2015 until on or about May 1, 2017.

7. In support of the loan application, defendant THOMAS ROBERTSON submitted two fake paystubs from his business that falsely overstated his bi-weekly and year-to-date income.

8. On or about October 19, 2018, defendant THOMAS ROBERTSON submitted a fraudulent loan application to Sun East Federal Credit Union seeking a \$2,500 personal loan.

9. The loan application completed and signed by defendant THOMAS ROBERTSON falsely overstated his monthly income and falsely claimed that he had been employed by his business since October 2015, when in fact he was federally incarcerated from before October 2015 until on or about May 1, 2017.

All in violation of Title 18, United States Code, Section 1344.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. The Pennsylvania State Employee's Credit Union was a financial institution, the deposits of which were insured by the National Credit Union Share Insurance Fund ("NCUSIF").
2. "Steven Hall" was a fictitious identity with a fictitious birthdate and social security number invented by defendant THOMAS ROBERTSON in furtherance of the charged scheme.
3. From in or about November of 2018 through in or about June of 2019, in the Eastern District of Pennsylvania, defendant

**THOMAS ROBERTSON,
a/k/a Steven Hall,**

knowingly executed and attempted to execute a scheme to obtain the money, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution insured by the NCUSIF, namely the Pennsylvania State Employee's Credit Union, by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

4. From in or about November of 2018 through in or about June of 2019, defendant THOMAS ROBERTSON knowingly executed and attempted to execute a scheme to use a false identity, a false employment history, falsely overstated income information, and fake paystubs to obtain loans and credit from the Pennsylvania State Employee's Credit Union.
5. From in or about November of 2018 through in or about June of 2019, defendant THOMAS ROBERTSON created fake paystubs with falsely overstated income in his

name, as well as in the names of others including his alias "Steven Hall," which were submitted to the Pennsylvania State Employee's Credit Union.

6. On or about November 6, 2018, defendant THOMAS ROBERTSON submitted a fraudulent loan application to the Pennsylvania State Employee's Credit Union seeking a \$10,000 personal loan.

7. The loan application completed and signed by defendant THOMAS ROBERTSON falsely overstated his annual income, and falsely claimed that he had been employed by his business since October 2015, when in fact he was federally incarcerated from before October 2015 until on or about May 1, 2017.

8. On or about November 23, 2018, defendant THOMAS ROBERTSON submitted a fraudulent loan application to the Pennsylvania State Employee's Credit Union seeking a \$5,000 personal loan.

9. The loan application completed and signed by defendant THOMAS ROBERTSON falsely overstated his annual income, and falsely claimed that he had been employed by his business since January 2015, when in fact he was federally incarcerated from before 2015 until on or about May 1, 2017.

10. In support of the loan application, defendant THOMAS ROBERTSON submitted three fake paystubs from his business that falsely overstated his bi-weekly and year-to-date income.

11. On or about November 27, 2018, defendant THOMAS ROBERTSON submitted a fraudulent loan application to the Pennsylvania State Employee's Credit Union seeking a \$47,500 vehicle loan.

12. The loan application completed and signed by defendant THOMAS

ROBERTSON falsely overstated his monthly and annual income, and falsely claimed that he had been employed by his business since October 2015, when in fact he was federally incarcerated from before 2015 until on or about May 1, 2017.

13. On or about December 3, 2018, defendant THOMAS ROBERTSON submitted a fraudulent loan application to the Pennsylvania State Employee's Credit Union, seeking a \$5,000 increase to his November 23, 2018 personal loan.

14. The loan application completed and signed by defendant THOMAS ROBERTSON falsely overstated his monthly and annual income, and falsely claimed that he had been employed by his business since October 2015, when in fact he was federally incarcerated from before 2015 until on or about May 1, 2017.

15. On or about February 17, 2019, defendant THOMAS ROBERTSON used the false identity "Steven Hall" to submit a fraudulent loan application to the Pennsylvania State Employee's Credit Union, seeking a \$2,000 personal loan.

16. The loan application completed and signed by defendant THOMAS ROBERTSON falsely overstated his monthly and annual income, and falsely claimed that he had been employed since April 2009, when in fact he was federally incarcerated from in or about December 2010 until on or about May 1, 2017.

17. In support of the loan application, defendant THOMAS ROBERTSON submitted three fake paystubs that falsely overstated his bi-weekly and year-to-date income.

18. On or about March 12, 2019, defendant ROBERTSON used the false identity "Steven Hall" to submit a fraudulent credit card application to the to the Pennsylvania State Employee's Credit Union, seeking a credit card with a \$2,000 credit limit.

19. The credit card application completed and signed by defendant THOMAS

ROBERTSON falsely overstated his monthly and annual income and falsely claimed that he had been employed since April 2009, when in fact he was federally incarcerated from in or about December 2010 until on or about May 1, 2017.

20. In support of the credit card application, defendant THOMAS ROBERTSON submitted two fake paystubs that falsely overstated his bi-weekly and year-to-date income.

21. On or about April 4, 2019, defendant THOMAS ROBERTSON used the false identity "Steven Hall" to submit a fraudulent loan application to the Pennsylvania State Employee's Credit Union, seeking a \$3,000 increase to his February 17, 2019 personal loan.

22. The loan application completed and signed by defendant THOMAS ROBERTSON falsely overstated his monthly and annual income, and falsely claimed that he had been employed since April 2009, when in fact he was federally incarcerated from in or about December 2010 until on or about May 1, 2017.

23. On or about April 19, 2019, defendant THOMAS ROBERTSON used the false identity "Steven Hall" to submit a fraudulent loan application to the Pennsylvania State Employee's Credit Union, seeking an approximate \$4,578.94 increase to his February 17, 2019 personal loan.

24. The loan application completed and signed by defendant THOMAS ROBERTSON falsely overstated his monthly and annual income, and falsely claimed that he had been employed since April 2009, when in fact he was federally incarcerated from in or about December 2010 until on or about May 1, 2017.

25. On or about May 6, 2019, defendant THOMAS ROBERTSON used the false identity "Steven Hall" to submit a fraudulent loan application to the Pennsylvania State

Employee's Credit Union, seeking a \$5,000 personal loan.

26. The loan application completed and signed by defendant THOMAS ROBERTSON falsely overstated his monthly and annual income, and falsely claimed that he had been employed since January 2010, when in fact he was federally incarcerated from in or about December 2010 until on or about May 1, 2017.

27. On or about May 21, 2019, defendant THOMAS ROBERTSON used the false identity "Steven Hall" to submit a fraudulent application in the name of "Steven Hall" to the Pennsylvania State Employee's Credit, in which he sought a \$3,000 credit increase on the credit card he had obtained on or about March 12, 2019.

28. The credit card application completed and signed by defendant THOMAS ROBERTSON falsely overstated his monthly and annual income, and falsely claimed that he had been employed since January 2010, when in fact he was federally incarcerated from in or about December 2010 until on or about May 1, 2017.

29. In support of the credit card application, defendant THOMAS ROBERTSON submitted two fake paystubs that falsely overstated his bi-weekly and year-to-date income.

30. On or about June 20, 2019, defendant THOMAS ROBERTSON used the false identity "Steven Hall" to submit a fraudulent application to the Pennsylvania State Employee's Credit, in which he sought a \$3,474 increase on the loan he had obtained on or about May 6, 2019.

31. The loan application completed and signed by defendant THOMAS ROBERTSON falsely overstated his monthly and annual income, and falsely claimed that he had been employed since January 2010, when in fact he was federally incarcerated from in or about

December 2010 until on or about May 1, 2017.

32. In support of the credit card application, defendant THOMAS ROBERTSON submitted three fake paystubs that falsely overstated his bi-weekly and year-to-date income.

All in violation of Title 18, United States Code, Section 1344.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Medallion Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").
2. On or about January 9, 2019, in the Eastern District of Pennsylvania, the defendant

**THOMAS ROBERTSON,
a/k/a Steven Hall,**

knowingly made and caused to be made, to Medallion Bank, false statements for the purpose of influencing the actions of the financial institutions, in that defendant ROBERTSON submitted two fake paystubs in his name that falsely overstated his bi-weekly and year-to-date income, knowing that the statements were false, for the purpose of obtaining a \$10,000 loan.

In violation of Title 18, United States Code, Section 1014.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Ally Financial, which is owned by Ally Bank, is a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").
2. On or about April 27, 2019, in the Eastern District of Pennsylvania, the defendant

**THOMAS ROBERTSON,
a/k/a Steven Hall,**

knowingly made and caused to be made, to Ally Financial, false statements for the purpose of influencing the actions of the financial institutions, in that defendant ROBERTSON falsely overstated his monthly income and length of employment, knowing that the statements were false, for the purpose of obtaining a \$40,890.70 vehicle loan.

All in violation of Title 18, United States Code, Section 1014.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1344 and 1014, set forth in this indictment, defendant

**THOMAS ROBERTSON,
a/k/a Steven Hall,**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense; including but not limited to the sum of \$146,716.39.

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18 United States Code, Section 982(a)(2)(A).

A TRUE BILL:



FOREPERSON



WILLIAM M. McSWAIN
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

THOMAS ROBERTSON
a/k/a "Steven Hall"

INDICTMENT

Counts

18 U.S.C. § 1344(2)-(Bank Fraud)-2 counts
18 U.S.C. § 1014-(False Statements on Loan Applications)-2 counts

A true bill.

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____